

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AMADEO ANGEL BUGATTI,

Plaintiff

vs.

JROB INTENSIVE WRESTLING
CAMPS, INC., J ROBINSON INTENSIVE
CAMPS, LLC,

Defendants

:
:
: JURY TRIAL DEMANDED
:
:
:

NO. _____

COMPLAINT

The Plaintiff, Amadeo Angel Bugatti, by and through his counsel, the Anzalone Law Offices, LLC, hereby complains of the Defendants, JROB Intensive Wrestling Camps, Inc. and J Robinson Intensive Camps, LLC, and in support thereof avers as follows:

THE PARTIES

1. The Plaintiff, Amadeo Angel Bugatti, is an adult individual and citizen of the State of Connecticut who resides and is domiciled at 31 Van Horn Drive, East Haven, New Haven County, Connecticut 06512.

2. The Defendant, JROB Intensive Wrestling Camps, Inc., is, upon information and belief, a Minnesota corporation with its principal place of business located at 529 S. 7th Street, # 507, Minneapolis, MN 55415.

3. The Defendant, J Robinson Intensive Camps, LLC, is, upon information and belief, a Minnesota limited liability company with its principal place of business located at 2520 E. Hennepin Avenue, Minneapolis, MN 55413.

4. The Defendants own and operate intensive wrestling camps for children and young adults across the United States, including their “Pennsylvania 14-Day Intensive Camp,” which is held annually at Edinboro University, 219 Meadville Street, Edinboro, Pennsylvania 16444.

JURISDICTION AND VENUE

5. The Defendants, JROB Intensive Wrestling Camps, Inc. and J Robinson Intensive Camps, LLC, are the owners and operators of “JROB Intensive Wrestling Camps,” which are held across the United States, including Pennsylvania.

6. The Defendants, JROB Intensive Wrestling Camps, Inc. and J Robinson Intensive Camps, LLC, regularly conduct business in the Commonwealth of Pennsylvania, and knowingly and intentionally conduct

business in the Commonwealth of Pennsylvania, as they operate its “Pennsylvania 14-Day Intensive Camp” at Edinboro University in the Western District of Pennsylvania.

7. This Court has jurisdiction over the Defendants because the Defendants maintain significant contacts in the Western District of Pennsylvania, and they continually and regularly conduct business in the Western District of Pennsylvania thereby making venue in the Western District of Pennsylvania appropriate pursuant to 28 U.S.C.A. § 1391(a).

8. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1332 (a), because complete diversity of citizenship exists between the parties, and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

9. In addition, venue is proper in this District pursuant to 28 U.S.C.A. § 1391(b)(2) because the incident giving rise to this suit occurred in Edinboro, Erie County, which is in the Western District of Pennsylvania.

FACTS

10. The Defendants, JROB Intensive Wrestling Camps, Inc. and J. Robinson Intensive Camps, LLC, at all times material hereto, owned, managed and operated their “Intensive Camps,” which included the “Pennsylvania 14-Day Intensive Camp” at Edinboro University.

11. The Defendants' Intensive Camps are touted by the Defendants as "the most challenging and life-changing wrestling camps in the country," with a "rigorous training model [that] operates on the principle that intense challenges bring about significant change. . . ." See jrobinsoncamps.com.

12. The Defendants' Intensive Camps claim to provide "a structured, accountable environment that pushes athletes to their physical and mental limits. Through 4 workouts a day that include technical skill sessions, live wrestling, drilling, running, and strength training, athletes will be taught a new meaning of hard work." See jrobinsoncamps.com.

13. The Plaintiff, Amadeo Angel Bugatti, was a participant in the 2018 JROB Intensive Wrestling Training Camp that took place at Edinboro University from June 17, 2018 through June 30, 2018.

14. At all times material hereto, the Defendants, acted by and through their employees, agents, and/or ostensible agents, including the coach who wrestled Amadeo Angel Bugatti on June 27, 2018.

15. On Wednesday, June 27, 2018, the Plaintiff, Amadeo Angel Bugatti, was participating in the eleventh day of the fourteen-day intensive training camp.

16. On that date, the Plaintiff, Amadeo Angel Bugatti, had four (4) training sessions, which consisted of a morning run, technique session, hard practice and an evening run.

17. The Plaintiff's, Amadeo Angel Bugatti's, hard practice was scheduled for 3:00-4:00 p.m., at which time the coach instructed the wrestlers to find a partner to wrestle.

18. The Plaintiff, Amadeo Angel Bugatti, paired up with a fellow participant to wrestle; however, shortly after, the Plaintiff, Amadeo Angel Bugatti, and his partner began their wrestling practice they were stopped by two unknown coaches.

19. One coach partnered with the Plaintiff's, Amadeo Angel Bugatti's, partner, and the other coach determined to wrestle the Plaintiff, Amadeo Angel Bugatti.

20. At all times material hereto, the coach who wrestled the Plaintiff, Amadeo Angel Bugatti, was acting in the course and scope of his employment and/or agency with the Defendants.

21. The Plaintiff, Amadeo Angel Bugatti, prepared to wrestle the coach, as this was not uncommon.

22. As the Plaintiff, Amadeo Angel Bugatti, was wrestling the coach, the coach began to get frustrated.

23. At that time, the unknown coach then body locked around the Plaintiff's, Amadeo Angel Bugatti's, waist, picked him up over his head and pulled him back down to the mat, accelerating the fall as the coach recklessly slammed the Plaintiff, Amadeo Angel Bugatti to the mat with full force.

24. At that time, the Plaintiff, Amadeo Angel Bugatti, put his hand down to protect his head and then heard cracking sounds and immediately felt an intense feeling of fire in his left arm.

25. The Plaintiff, Amadeo Angel Bugatti, then yelled at the coach, "what did you just do, why did you do that?" and the coach backed away.

26. The Defendants' trainers then ran to the Plaintiff, Amadeo Angel Bugatti, and called an ambulance.

27. The Plaintiff, Amadeo Angel Bugatti, was taken via ambulance to Mill Creek Hospital with a diagnosis of "left forearm both bone fracture," and was thereafter transferred to UPMC Harmot Emergency Department.

28. As a result of coach's inappropriate use of force against the Plaintiff, Amadeo Bugatti, the Plaintiff, Amadeo Angel Bugatti, was diagnosed with a segmental comminuted radial meet shaft fracture as well as ulnar mid shaft fracture with shortening, displacement and angulation.

29. On June 28, 2018, the Plaintiff, Amadeo Angel Bugatti, underwent open reduction and internal fixation of his left radial shaft fracture and open reduction and internal fixation of his left ulnar shaft fracture.

30. As a result of the above-described incident, the Plaintiff, Amadeo Angel Bugatti, sustained serious and permanent injuries.

31. As a result of the above-described incident and the injuries he sustained, the Plaintiff, Amadeo Angel Bugatti, was forced to undergo surgery and additional medical care.

32. As a result of the above-described incident and the injuries he sustained, the Plaintiff, Amadeo Angel Bugatti, has obtained medical care and treatment from various providers for which a recovery is sought.

33. As a result of the above-described incident and the injuries he sustained, the Plaintiff, Amadeo Angel Bugatti, lost a full scholarship to continue his education and wrestling career.

34. As a result of the above-described incident and the injuries he sustained, the Plaintiff, Amadeo Angel Bugatti, suffered and continues to suffer a loss of his earning capacity and power which loss is alleged to be permanent, for which a claim is hereby made.

35. As a result of the aforesaid injuries, the Plaintiff, Amadeo Angel Bugatti, was rendered sick, sore and disabled and sustained physical and mental pain and great discomfort, all of which required medical care and treatment.

36. As a result of the aforesaid injuries, the Plaintiff, Amadeo Angel Bugatti, suffered and continues to suffer great physical and mental pain, discomfort, inconvenience, and has been informed, believes and avers that his injuries are of a continuing and permanent nature, and that he will continue to suffer in the future and require additional medical care and treatment from time to time.

37. The Plaintiff, Amadeo Angel Bugatti, has been informed, believes and avers that he may be obliged to spend various sums of money and incur various expenses for treatment of the aforementioned injuries in the future for which the Plaintiff makes a claim herein.

38. Additionally, as a result of the injuries sustained in this incident, the Plaintiff, Amadeo Angel Bugatti, has sustained and will continue to sustain a loss of everyday pleasures and enjoyments of life, for which a claim is herein made.

WHEREFORE, the Plaintiff, Amadeo Angel Bugatti, seeks compensatory damages from the Defendants, JROB Intensive Wrestling

Camps, Inc. and J. Robinson Intensive Camps, LLC, jointly, severally, jointly and severally, in an amount in excess of seventy-five (\$75,000.00) dollars.

COUNT I – NEGLIGENCE

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39. The Plaintiff incorporates by reference the allegations contained in Paragraphs 1 through 38 as though the same were set forth at length herein.

40. The aforementioned injuries sustained by the Plaintiff, Amadeo Angel Bugatti, were the direct and proximate result of the negligence, carelessness and recklessness of the Defendants, JROB Intensive Wrestling Camps, Inc. and J. Robinson Intensive Camps, LLC, by and through its employees, agents, servants and/or workmen, particularly the coach who wrestled the Plaintiff, Amadeo Angel Bugatti, on June 27, 2018, in the following respects:

- (a) In then and there using excessive and reckless force when coaching the Plaintiff, Amadeo Angel Bugatti, at the wrestling camp;
- (b) In then and there wrestling the Plaintiff in a manner well outside the scope of any consent provided by the Plaintiff for such activities;

(c) In then and there coaching and wrestling outside the standards applicable and appropriate at the Defendants' camps;

(d) In then and there inappropriately and recklessly body-slammimg the Plaintiff, Amadeo Angel Bugatti, to the ground during a coach-wrestler training session; and,

(e) In then and there using excessive and reckless force in wrestling the Plaintiff, Amadeo Angel Bugatti, when he (the unidentified coach) was supposed to be wrestling the Plaintiff with the intent of monitoring the Plaintiff's skills.

WHEREFORE, the Plaintiff, Amadeo Angel Bugatti, seeks compensatory damages from the Defendants, JROB Intensive Wrestling Camps, Inc. and J. Robinson Intensive Camps, LLC, jointly, severally, jointly and severally, in an amount in excess of seventy-five (\$75,000.00) dollars.

Respectfully Submitted,
ANZALONE LAW OFFICES

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VERIFICATION

I, AMADEO ANGEL BUGATTI, Plaintiff herein, certify that the statements contained in the foregoing Complaint are true and correct and are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities.



AMADEO ANGEL BUGATTI